

Fair Labor Defense LLC

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October 11, 2021

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza
Courtroom: 4H North
Brooklyn, New York 11201

Re: *Lord v. Colley*, No. 21 Civ. 04416

Judge Hall:

I am counsel for Plaintiff in the above-captioned case. Filed on August 5, 2021, the complaint alleges overtime and wage claims in violation of the Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq. (the "FLSA"), as well as related state law claims.

I write to inform the court that the parties have reached a settlement in the case for \$35,000 inclusive of attorneys' fees and costs. Thus, we respectfully request that Defendants' time to answer or otherwise respond be adjourned *sine die* while the parties arrange the particulars. The parties expect the settlement to be accomplished with an offer of judgment pursuant to Fed. R. Civ. P. 68 on or before Wednesday, December 15, 2021, with money held in escrow at counsel for Defendants to be then transferred to Plaintiff along with Defendants' notice of acceptance of the judgement to be filed simultaneously.

Counsel are grateful for the Court's time and attention to this matter.

Respectfully,

/s/ **David Kasell**
David Kasell
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